

To: Daly, Carl[Daly.Carl@epa.gov]; Rothery, Deirdre[Rothery.Deirdre@epa.gov]; Morales, Monica[Morales.Monica@epa.gov]
Cc: Logan, Paul[Logan.Paul@epa.gov]; Boydston, Michael[Boydston.Michael@epa.gov]
From: Sutin, Elyana
Sent: Wed 9/30/2015 8:58:09 PM
Subject: FW: U&O Minor NSR FIP for Existing Sources

Carl,

I sent the following message to Rick to see if he is our contact. I am not sure who Rick reports to, at this point. Hopefully, Rick will be responsive and let us know if he is on the team. We will keep you posted.

Elyana

Elyana Sutin | EPA Region 8 | Regional Judicial Officer

Associate Regional Counsel

303.312.6899 | sutin.elyana@epa.gov

From: Sutin, Elyana
Sent: Wednesday, September 30, 2015 1:59 PM
To: Vetter, Rick
Cc: Matsumoto, Kimi; Varilek, Kimberly
Subject: U&O Minor NSR FIP for Existing Sources

Hi Rick,

I hope this email finds you well. The Region is getting ready to embark on another major endeavor in Indian Country. I wanted to see if you were aware of it and if you have been assigned to work with us. If you are on the U&O FIP team, welcome!! We

are happy to get you any information you need to get up to speed. The Region has proposed an ambitious schedule to complete the FIP, not unlike the Fort Berthold FIP. I have included the schedule, as of today, for you. Also, I have provided a short background to get you acclimated. Please let us know what you need. If you are not working on this, if you can let me know that as well, that would be great.

Schedule:

		Completion	
<u>Task</u>		<u>Date</u>	
<u>Responsibility</u>	<u>Supporting Responsibility</u>		
Route Draft FIP and TSD for OAR/R8 concurrent review R8 RA, OGC (1 month)		10/21/2015	OAR, R8 Air
Complete HQ Concurrence R8, OGC (4 months)		11/20/2016	OAR
Complete OMB Review of Proposed FIP (2 weeks)		3/18/2016	
Transmit Proposed FIP to OFR OAR R8 RA, Air ORC (2 months)		4/1/2016	R8 Air,
Complete 45 Public Comment Period & Hearing RA, Air, ORC OGC (2 months)		6/1/2016	R8
Complete Responses to Public Comments ORC, OAR OGC (2 weeks)		8/1/2016	R8 Air,

Obtain Administrator Signature on Final FIP 8/15/2016
OA/OAR R8

(2 days)

Transmit Final FIP to OFR 8/17/2016 R8 Air,
OAR R8 RA, Air ORC

(2 weeks)

Publish in FR 8/31/2016 R8 Air,
OAR R8 RA, Air ORC

Background

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High Ozone levels have been observed over the last few years at numerous air monitors (tribal and state) in the Uinta Basin during winter inversions (as high as 134ppb in 2013). Approximately 98% of all VOCs and approximately 60% of all NOx emissions released in the Uinta Basin are from oil and gas sources. It is estimated that 75% of those sources are on the Reservation. There are approximately 10,000 existing O&G wells producing in the Basin without federally required emission controls.

The national rules (NSPS OOOO and the Tribal NSR FIP for new and modified sources) are out for public comment but fall short of addressing emissions from existing O&G sources. A reservation specific FIP would consider Utah's rules for emission reductions at existing O&G sources in order to be consistent.

Thanks,

Elyana

Elyana Sutin | EPA Region 8 | Regional Judicial Officer

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